

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

DUANE & VIRGINIA LANIER
TRUST, on behalf of Himself and all
others similarly situated,

Plaintiff,

v.

(1) SANDRIDGE ENERGY, INC.
(2) SANDRIDGE MISSISSIPPIAN
TRUST I,
(3) SANDRIDGE MISSISSIPPIAN
TRUST II,
(4) TOM L. WARD,
(5) JAMES D. BENNETT,
(6) MATTHEW K. GRUBB,
(7) RANDALL D. COOLEY,
(8) JIM J. BREWER,
(9) EVERETT R. DOBSON,
(10) WILLIAM A GILLILAND,
(11) DANIEL W. JORDAN,
(12) ROY T. OLIVER, JR.,
(13) JEFFREY S. SEROTA,
(14) D. DWIGHT SCOTT,
(15) RAYMOND JAMES &
ASSOCIATES, INC.,
(16) MORGAN STANLEY & CO.,
LLC,
(17) MERRILL LYNCH, PIERCE,
FENNER & SMITH, INC.,
(18) CITIGROUP GLOBAL
MARKETS, INC., and
(19) RBC CAPITAL MARKETS, LLC

Defendants.

Case No. CIV-15-0634-M

**JOINT MOTION FOR EXTENSION OF TIME FOR LEAD PLAINTIFFS TO
FILE THE CONSOLIDATED AMENDED COMPLAINT**

WHEREAS Plaintiff Duane & Virginia Lanier Trust filed its complaint in the above captioned case on June 9, 2015 against the Defendants named in the caption above (collectively “Defendants”) asserting claims under the federal securities laws on behalf of a putative class of persons who purchased or otherwise acquired common units of (i)

Sandridge Mississippian Trust I (“Trust I”) pursuant or traceable to Trust I’s initial public offering on or about April 7, 2011, and/or at all other times during the time period between April 7, 2011 and November 8, 2012, both dates inclusive (“Class Period”); and/or (ii) Sandridge Mississippian Trust II (“Trust II”) pursuant or traceable to Trust II’s initial public offering on or about April 17, 2012, and/or at all other times during the Class Period (the “Class”);

WHEREAS, on June 24, 2015, the Court entered a stipulated order extending all defendants’ time to respond to the original complaint and requiring a consolidated amended complaint to be filed after the Court entered an order appointing a lead plaintiff in this action;

WHEREAS, in an opinion and order entered on March 16, 2016, the Court appointed Ivan Nibur, Lawrence Ross, Jase Luna, Matthew Willenbacher, and the Duane & Virginia Lanier Trust (collectively, “Lead Plaintiffs”) as Lead Plaintiffs and approved Lead Plaintiff’s selection of counsel and appointed The Rosen Law Firm, P.A. as lead counsel and Farha Law, PLLC as liaison counsel for the Class.

WHEREAS Lead Plaintiffs intend to file a consolidated amended complaint (the “Consolidated Complaint”). Lead Plaintiffs have requested Defendants’ agreement to an extension of their time to file the Consolidated Complaint in order to permit time to conduct the extensive investigation necessary to draft the Consolidated Complaint in light of Lead Plaintiffs’ attorneys’ pre-existing commitments in April, 2016.

WHEREAS Lead Plaintiffs and Defendants have agreed to extend Lead Plaintiffs’ time to file the Consolidated Complaint with concomitant extensions of the schedule for

Defendants to respond to that pleading, including a briefing schedule if Defendants file motions to dismiss the Consolidated Complaint;

WHEREAS pursuant to Local Civil Rule 7.1(h), Lead Plaintiffs state that the Court has previously entered a briefing schedule and that granting this Request would make the following changes to the briefing schedule:

	Old deadline	New deadline
Consolidated Complaint	May 2, 2016	May 30, 2016
Responses	July 1, 2016	July 29, 2016
Oppositions (if responses are motions to dismiss)	August 30, 2016	September 27, 2016
Replies	September 29, 2016	October 27, 2016

WHEREAS Lead Plaintiffs additionally state that the extension will have no impact on trial or other deadlines, since none have been set, that the Defendants do not oppose the extension.

Now, therefore, the Parties jointly move the Court for the following briefing schedule for the filing of a consolidated amended complaint and pleadings or motions responsive thereto:

1. Lead Plaintiffs will have until May 30, 2016 to file a consolidated amended complaint;
2. Defendants will have until July 29, 2016 to file a motion to dismiss or other response to the Consolidated Complaint;
3. After the filing of Defendants' motion to dismiss, if one is filed, Lead Plaintiffs will have until September 27, 2016 to file their opposition.

4. After the filing of Lead Plaintiffs' opposition papers, if one is filed, the Parties will have until October 27, 2016 to file their reply, if any.

5. A proposed order is filed concurrently herewith.

WHEREFORE, Lead Plaintiffs respectfully request that the Court enter an order setting the requested schedule for the filing of and responses to the Consolidated Complaint.

Respectfully submitted,

s/Nicholas G. Farha

Nicholas G. Farha, OBA # 21170
Farha Law, PLLC
6301 Waterford Blvd., Suite 110
Oklahoma City, OK 73118
(405) 471-2224
(405) 810-9901 (Facsimile)
nick@farhalawfirm.com

ATTORNEYS FOR PLAINTIFF DUANE &
VIRGINIA LANIER TRUST

OF COUNSEL

THE ROSEN LAW FIRM, P.A.
Laurence M. Rosen, Esq.
Phillip Kim, Esq.
275 Madison Avenue, 34th Floor
New York, NY 10016
(212) 868-1060
(212) 202-3827 (Facsimile)

WOHL & FRUCHTER, LLP
J. Elazar Fruchter
570 Lexington Avenue, 16th Floor
New York, NY 10022
(212) 758-4000
(212) 758-4004 (Facsimile)

Respectfully submitted,

/s/ Mitchell D. Blackburn

Mitchell D. Blackburn, OBA #12217
Kiran A. Phansalkar, OBA #11470
CONNER & WINTERS, LLP
211 N. Robinson, Suite 1700
Oklahoma City, OK 73102
Telephone: (405) 272-5711
Facsimile: (405) 232-2695
Email: mblackburn@cwlaw.com

ATTORNEYS FOR DEFENDANT SANDRIDGE
ENERGY, INC.

s/Thomas B. Snyder

Thomas B. Snyder, CA #211230
CROWE & DUNLEVY
A Professional Corporation
324 N. Robinson, Suite 100
Oklahoma City, OK 73102-8273
(405) 235-7700
(405) 239-6651 (Facsimile)
thomas.snyder@crowedunlevy.com

ATTORNEYS FOR DEFENDANTS JAMES D.
BENNETT, MATTHEW K. GRUBB, RANDALL
D. COOLEY, JIM J. BREWER, EVERETT R.
DOBSON, WILLIAM A GILLILAND, DANIEL
W. JORDAN, ROY T. OLIVER, JR., JEFFREY S.
SEROTA, AND D. DWIGHT SCOTT

Respectfully submitted,

s/George S. Corbyn, Jr.

George S. Corbyn, Jr., OBA # 1910
CORBYN HAMPTON, PLLC
211 North Robinson, Suite 1910
One Leadership Square
Oklahoma City, OK 73102
(405) 239-7055

ATTORNEYS FOR DEFENDANT TOM L. WARD

Respectfully submitted,

s/Ryan S. Wilson

Ryan S. Wilson
WILSON LAW FIRM
Post Office Box 891390
Oklahoma City, OK 73189
Phone: 405.246.0092
Fax: 405.246.9652
Email: ryan@RSWilsonlaw.com

ATTORNEYS FOR SANDRIDGE MISSISSIPPIAN
TRUST I, SANDRIDGE MISSISSIPPIAN TRUST II

Respectfully submitted,

s/Robert A. Nance

Michael C Turpen

Robert A. Nance

RIGGS ABNEY NEAL TURPEN ORBISON LEWIS

528 N.W. 12th Street

Oklahoma City, OK 73103

405-843-9909

Fax: 405-842-2913

Email: mturpen@riggsabney.com

Email: rnance@riggsabney.com

ATTORNEYS FOR RAYMOND JAMES &
ASSOCIATES INC., MORGAN STANLEY & CO. LLC,
MERRILL LYNCH PIERCE FENNER & SMITH INC.,
CITIGROUP GLOBAL MARKETS INC., RBC
CAPITAL MARKETS LLC

CERTIFICATE OF SERVICE

I certify that on the 5th day of April, 2016, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the appropriate ECF registrants.

By: s/ Nicholas G. Farha
Nicholas G. Farha